

**GUIDANCE ON THE
COMPREHENSIVE SCHOOL REFORM
DEMONSTRATION PROGRAM**



U.S. DEPARTMENT OF EDUCATION

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UPDATED GUIDANCE ON THE COMPREHENSIVE SCHOOL REFORM DEMONSTRATION (CSRD) PROGRAM

October 4, 1999

This is an updated version of the Guidance on the Comprehensive School Reform Demonstration Program that was originally issued in March, 1998. This version adds responses to subsequent guidance inquiries that have been received by the program office. For ease of use, all supplementary information appears in italics.

A. PURPOSE OF THE PROGRAM

A-1. What is the purpose of the CSRD program?

The purpose of the program is to provide financial incentives for schools that need to substantially improve student achievement, particularly Title I schools, to implement comprehensive school reform programs that are based on reliable research and effective practices, and include an emphasis on basic academics and parental involvement. These programs are intended to stimulate schoolwide change covering virtually all aspects of school operations, rather than a piecemeal, fragmented approach to reform. Thus, to be considered comprehensive, a program must integrate, in a coherent manner, nine specific components listed in the legislation. (See [B-1](#).) Through supporting comprehensive school reform, the program aims to enable all children in the schools served, particularly low-achieving children, to meet challenging State content and student performance standards.

A-2. What is the relationship between the CSRD legislation and other education improvement initiatives, particularly Title I schoolwide programs, Goals 2000, and School-to-Work?

The CSRD legislation, Title I schoolwide programs, Goals 2000, and School-to-Work are designed to support in a coordinated fashion comprehensive education improvement strategies to enable all children -- including children from low-income families, children with limited English proficiency, and children with disabilities -- to reach challenging academic standards. There is a special emphasis in the CSRD legislation on supporting the initial implementation of comprehensive school reform programs that have a strong research basis and that have been successfully replicated. CSRD resources should be coordinated with other Federal funds, as well as State, local, and private resources, to leverage school improvement, particularly in Title I schools.

A-3. How does the CSRD program fit within the broader context of a school's improvement efforts?

The CSRD program is intended to provide incentives for schools, particularly Title I schools in need of improvement, to engage in comprehensive school reform in order to raise the achievement of children in those schools. It is not a separate project that is "added on" to existing projects in a school. Rather, its purpose is to stimulate schools to revamp their overall educational operation by implementing a comprehensive reform program. CSRD funds alone are not intended to support the full implementation of a comprehensive reform program on an ongoing basis, including possible curriculum changes, sustained professional development, enhanced parental involvement, and the like. Rather, a school engaging in comprehensive school reform must coordinate all the resources available to it -- including Federal, State, local, and private sources -- to support its reform effort.

A-4. What program requirements apply to the CSRD program?

The CSRD program is governed by the language in Public Law 105-78, the FY 1998 Department of Education Appropriations Act. That act incorporates, by reference, the language in the conference report (See Appendix A) that specifically delineates how the program must operate. The Department does not intend to issue regulations for this program.

B. COMPONENTS OF A COMPREHENSIVE SCHOOL REFORM PROGRAM

B-1. What is a "comprehensive school reform program"?

A comprehensive school reform program is one that integrates, in a coherent manner, **all** nine of the following components:

1. **Effective, research-based methods and strategies:** A comprehensive school reform program employs innovative strategies and proven methods for student learning, teaching, and school management that are based on reliable research and effective practices, and have been replicated successfully in schools with diverse characteristics.
2. **Comprehensive design with aligned components:** The program has a comprehensive design for effective school functioning, including instruction, assessment, classroom management, professional development, parental involvement, and school management, that aligns the school's curriculum, technology, and professional development into a schoolwide reform plan designed to enable all students -- including children from low-income families, children with limited English proficiency, and children with disabilities -- to meet challenging State content and performance standards and addresses needs identified through a school needs assessment.

3. **Professional development:** The program provides high-quality and continuous teacher and staff professional development and training.
4. **Measurable goals and benchmarks:** A comprehensive school reform program has measurable goals for student performance tied to the State's challenging content and student performance standards, as those standards are implemented, and benchmarks for meeting the goals.
5. **Support within the school:** The program is supported by school faculty, administrators, and staff.
6. **Parental and community involvement:** The program provides for the meaningful involvement of parents and the local community in planning and implementing school improvement activities.
7. **External technical support and assistance:** A comprehensive reform program utilizes high-quality external support and assistance from a comprehensive school reform entity (which may be a university) with experience or expertise in schoolwide reform and improvement.
8. **Evaluation strategies:** The program includes a plan for the evaluation of the implementation of school reforms and the student results achieved.
9. **Coordination of resources:** The program identifies how other resources (Federal, State, local, and private) available to the school will be utilized to coordinate services to support and sustain the school reform.

B-2. Must a comprehensive school reform program contain all nine components that are listed in Question B-1?

Yes. A comprehensive school reform program supported with CSRD funds must integrate, in a coherent manner, all nine components listed in Question B-1. It is the interrelation of the components that makes a program truly comprehensive. Thus, in designing its program, a school should exercise care that the models and strategies it incorporates, including those listed in the legislation, are integrated into a coherent whole. A given model may contain all nine components and thus, in and of itself, constitute a comprehensive school reform program as defined in the legislation. On the other hand, a model may lack certain components. To have a comprehensive program under the CSRD, therefore, a school would have to incorporate the missing components. As a school incorporates components, however, it must be careful to ensure that those components relate to the whole of its program, because CSRD funds are not intended to support a patchwork quilt of strategies that, however sound individually, do not make a coherent, well-designed schoolwide program.

B-3. What kind of evidence is critical in determining whether models within a comprehensive school reform program are research-based and effective?

A comprehensive school reform program must employ innovative models and strategies and proven methods to improve teaching and learning that are based on reliable research and effective practices and that have been replicated successfully. A clear definition of what constitutes reliable evidence of effectiveness is critical to the successful selection and implementation of research-based school reform models. Research-based models can provide evidence along four dimensions:

1. **The theoretical or research foundation for the program:** A theory or research findings explain why a comprehensive model and the practices included in the model work together to produce gains in student performance;
2. **Evaluation-based evidence of improvements in student achievement:** Evidence of educationally significant improvement is shown through reliable measures of student achievement in major subject areas before and after model implementation;
3. **Evidence of effective implementation:** Implementation is a description of what it takes to make the model fully operational in schools; and
4. **Evidence of replicability:** Replicability means that the model has been successfully implemented in more than one school.

The Department encourages States to consider these four dimensions when they request evidence of the effectiveness of research-based school improvement models. Models should be grounded in some theory or research-based explanation of why the model improves student achievement. Models should provide data that student achievement improved following the implementation of the program. Models should be able to describe what it took to fully implement them in one or more sites. Finally, models should show that they have been successfully replicated in sites other than the site of their original implementation.

Ideally, effective evidence would demonstrate that a theory-based model that has been evaluated using classic experimental control group designs in multiple sites for different groups of children, using a before-and-after third-party assessment. For a variety of reasons such data are not available for most education models. In practice, the quality of the evidence available for each of the four dimensions is likely to vary not only from program to program but also within a particular program. A program might have a very strong theory for why it should work and evidence that it improves student outcomes for some children, but might have only weak evidence of effective replicability. In considering models, States might want to evaluate evidence along a continuum from most rigorous to marginal.

The table in [Appendix B](#) is designed to assist States in evaluating the effectiveness of school reform models. The table poses illustrative questions that States might want to ask when evaluating research-based models. The most effective models would be those that can provide the most rigorous evidence for each of the four dimensions. Models that cannot provide at least marginal evidence for each of the factors should probably not be accepted for implementation. Following the table are examples in which the factors are applied to hypothetical school reform models.

B-4. Is a State educational agency (SEA) responsible for ensuring that only research-based comprehensive school reform programs are funded?

Yes. In its application to the Department for CSRD funding, each SEA must demonstrate how it will ensure that the teaching, student learning, and school management models to be implemented are based on reliable research and effective practices, and have been replicated successfully in schools with diverse characteristics. While each funded program must be composed primarily of research-based teaching, learning, and school management models, it may also contain some strategies for which there is little empirical data of success. In determining which schools to support, it is the SEA's responsibility for ensuring that the program proposed to be implemented, as a whole, has a strong research foundation. The guidance and chart on research-based reform models (See [B-3](#) and [Appendix B](#)) should assist SEAs in establishing a subgrant process and selection criteria that address this fundamental program requirement. (For further discussion on the development of selection criteria, see [F-3](#).)

B-5. Must a school's comprehensive reform program include one of the specific reform models referenced in the legislation?

No. The models referenced in the legislation are examples only. However, the CSRD legislation encourages schools to examine successful, externally developed comprehensive school reform models with proven evidence of effectiveness.

B-6. To receive CSRD funds, must a school implement a comprehensive school reform program that includes an externally developed reform model?

A school may develop its own comprehensive school reform program that is based on rigorous research and integrates, in a coherent manner, the nine components listed in [B-1](#). However, the CSRD legislation encourages schools to examine successful, externally developed comprehensive school reform models with proven evidence of effectiveness. Also, before developing its own program, a school should inquire whether its SEA intends to give competitive preference to schools that propose to implement successful externally developed models. (See [F-3\(2\)](#) and [F-4](#).)

C. FEDERAL AWARDS TO STATES

C-1. On what basis will the Department award CSRD funds to SEAs?

The Department will award CSRD grants, on a formula basis, to SEAs that submit an application containing the statutorily required information. (See [D-1.](#))

The Department will award funds for this program under two separate authorities -- section 1502 (Demonstration of Innovative Practices) of Title I of the Elementary and Secondary Education Act (ESEA) and the Fund for the Improvement of Education (FIE) in Part A of Title X of the ESEA. In fiscal year 1998, Congress appropriated \$145 million for State grants for CSRD activities. Of this amount, \$120 million was appropriated under the section 1502 authority and will be distributed to SEAs according to each State's proportion of funds received under section 1124 of Title I for the 1997-98 school year. The remaining \$25 million was appropriated under the FIE authority and will be distributed to SEAs based on each State's relative share of the school-aged population (ages 5-17 inclusive). The allocation amounts for future years will be determined by the appropriations for those years.

C-2. Are the outlying areas and the Bureau of Indian Affairs eligible to receive CSRD funds?

Yes. The Secretary is authorized to reserve up to one percent of the CSRD funds for allocations to the outlying areas (the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands) and the Bureau of Indian Affairs. The consolidated grant provisions for the outlying areas apply to awards under this program.

C-3. When will CSRD funds become available to the States?

Fiscal year 1998 CSRD funds become available to States on July 1, 1998, and remain available to the Department for award to the States until September 30, 1999.

C-4. When may an SEA submit its application for CSRD funds?

An SEA may submit its application for CSRD funds any time prior to July 1, 1999. Applications will be processed and reviewed on a rolling basis as soon as they are received. Thus, SEAs are encouraged to submit their applications as early as possible so that they can receive funding on a timely basis and begin the process of awarding subgrants to eligible local educational agencies (LEAs).

C-5. What happens to a State's allocation if it does not apply for CSRD funds?

The Secretary anticipates that all States will participate in this program. However, if an SEA does not apply for CSRD funds, the Secretary will reallocate those funds to other States that have a need for additional funds to implement comprehensive school reform programs. A State's failure to participate in the CSRD program will not have any effect on its receipt of other Federal resources.

C-6. Why do the FY1999 CSRD allocations of states vary slightly from their FY1998 allocations?

Funds appropriated under the Title I CSRD authority are allocated on the basis of each state's proportion of funds received under section 1124 of Title I for the preceding school year. The FY1999 CSRD allocations were made on the basis of each state's relative share of Title I for the 1998-99 school year. Because there were slight variations in some states' relative share of Title I, there were corresponding variations in their relative share of CSRD funds.

C-7. If a state's CSRD allocation increased from FY1998 to FY1999, how may the additional CSRD resources be used?

If a state received more than \$50,000 in additional CSRD funds, the state may choose to fund a new CSRD site. The state could also fund additional CSRD activities in previously selected sites. If the additional CSRD amount is less than \$50,000, the state may not fund new sites below the \$50,000 threshold, but could fund additional activities at previously selected sites.

For example, states could award additional funds to increase activities related to an individual school's comprehensive reform program, e.g., increased staff professional development activities in certain subject areas or for specific instructional techniques; increased networking among schools working on similar comprehensive reform issues; or enhanced parental involvement activities. States could also use the funds to assist the dissemination from CSRD schools to non-CSRD schools lessons learned about effective ways to implement comprehensive schoolwide reforms. Another option would be for states to allocate to existing CSRD sites a pro-rata share of the increased funds to augment current CSRD activities. A state is not required to hold a formal competition in order to distribute the additional funds it receives. In any event, the proportion of CSRD funds retained by the SEA for administration, evaluation and technical assistance must not be greater than 5%.

C-7(a). If a state's CSRD allocation decreased from FY1998 to FY 1999, how can the state adjust its distribution of CSRD funds?

A state has substantial discretion over how to address this situation. One option would be for an SEA to decrease the amount that is retained for administration, evaluation and technical assistance. Alternatively, the SEA may decrease the allocations to CSRD grantees, either on a pro-rata basis, or by adjusting awards according to its analysis of school needs or proposed budgets. If necessary, a state may also use funds from the subsequent fiscal year, subject to appropriations. However, if sufficient funds are available from one of these sources, a site may not be funded below the \$50,000 per year threshold, even if there is a reduction in the state's total allocation.

D. STATE APPLICATION REQUIREMENTS

D-1. What are the key issues that must be addressed in an SEA's application for CSRD funding?

An SEA's application for CSRD funding must describe:

1. **The subgrant process and selection criteria:** The application must describe the process and selection criteria by which the SEA, using expert review, will make competitive grants to eligible LEAs under each source of funds. The SEA should include, for example, any competitive preferences it establishes. (See F-3.) The SEA may wish to provide its Draft LEA application or other draft guidance, if available.
2. **Strategies to ensure quality:** The SEA must describe how it will ensure that only high-quality, well-defined, and well-documented comprehensive school reform programs that integrate, in a coherent manner, all nine components listed in B-1 are funded. Question B-3 and Appendix B provide guidance on making judgments about evidence of effectiveness.
3. **Dissemination strategies:** The SEA must describe how it will work with the Regional Education Laboratories, Comprehensive Regional Assistance Centers, and others to disseminate materials identifying research-based comprehensive school reform models and provide technical assistance to assist LEAs and schools in evaluating, selecting, developing, and implementing comprehensive school reforms.
4. **State evaluation strategies:** The application must describe how the SEA will evaluate the implementation of comprehensive school reforms supported under the program and measure the results achieved in improving student academic performance. In addressing this requirement, an SEA may submit a description of its anticipated evaluation strategies, rather than a formal evaluation plan. (See I-1.)

D-2. Should a State apply for both section 1502 funds and FIE funds in the same application?

Yes. States are encouraged to submit to the Department a single application that covers both the section 1502 and FIE funds.

D-3. May a State amend its ESEA consolidated State plan to address the issues identified in Question D-1 rather than submitting a separate application?

Yes. An SEA may amend its consolidated State plan rather than submitting a separate application, provided the SEA addresses the issues identified in D-1.

E. FUNDS RESERVED FOR STATE USE

E-1. May an SEA reserve a portion of its allocations for State use?

Yes. An SEA may reserve up to five percent of its CSRD allocation under section 1502 and up to five percent of its CSRD allocation under FIE for administrative, evaluation, and technical assistance expenses, including expenses necessary to inform LEAs and schools about research-based comprehensive school reform approaches. The remaining funds must be used for competitive grants to eligible LEAs.

E-2. May an SEA combine State funds that are reserved under section 1502 and FIE?

Yes. CSRD funds that are reserved by an SEA under the section 1502 and FIE authorities may be combined and need not be tracked separately. The funds may support administrative, evaluation, and technical assistance expenses related to any part of the State's CSRD program.

F. STATE AWARDS TO LEAs

F-1. What entities are eligible to apply to an SEA for CSRD funds?

LEAs are eligible to apply to their SEA for CSRD funds on a competitive basis as follows:

- **Section 1502 funds:** Only LEAs that are eligible to receive Title I, Part A funds may apply for CSRD funds awarded under the section 1502 authority.
- **FIE funds:** Any LEA may apply for CSRD funds awarded under the FIE authority.

F-2. In which schools may an LEA use CSRD funds?

- **Section 1502 funds:** CSRD funds awarded to an LEA under section 1502 may be used only in schools that are eligible to participate under Title I, Part A.
- **FIE funds:** CSRD funds awarded under the FIE authority may be used for comprehensive school reform programs in any school.

SEAs are encouraged to target CSRD Title I funds on Title I schools that have been identified as in need of improvement under section 1116(c) of the ESEA. (See [F-3\(1\)](#).)

F-3. On what basis does an SEA award subgrants to eligible LEAs?

An SEA awards subgrants to eligible LEAs on a competitive basis. In order to best address the intent of the legislation -- i.e., to raise student achievement through effective, research-based comprehensive school reform programs -- an SEA should develop selection criteria that distinguish among applicants on two dimensions: need for reform and quality of the program.

1. **Targeting resources on schools with the greatest need for reform:** The clear focus of the legislation is to stimulate schoolwide change in schools that need to substantially improve student achievement, particularly Title I schools, so that all students in those schools can meet challenging State content and performance standards. Thus, an SEA should consider developing selection criteria that will distinguish those schools with the greatest need to raise the achievement of their students. In developing its selection criteria, an SEA should consider the following:

- Title I schools in need of improvement: One of the strongest indicators of need is where a Title I participating school has been identified as in need of improvement under 1116(c) of the ESEA. Thus, in awarding CSRD subgrants under section 1502, SEAs are encouraged to give competitive preference to LEAs that would use the funds in these schools. An SEA could give this competitive preference, for example, by including in its subgrant selection criteria additional points or greater weight for applicants that would serve Title I schools in need of improvement. Furthermore, because the legislation expressly encourages States to use section 1502 funds in Title I schools that are in need of improvement under 1116(c), an SEA may, if it chooses, establish an absolute priority under which only these schools would be eligible for section 1502 support.

In awarding subgrants under the FIE authority, SEAs may also give competitive preference to LEAs that would use FIE funds in Title I schools in need of improvement. However, because Congress appropriated funds for the CSRD program under FIE, as well as under Title I, for the very purpose of making non-Title I schools eligible to apply, an SEA may not establish an absolute priority that would limit eligibility for FIE support to Title I schools.

- Schools with high dropout rates and other factors that reflect need: An SEA may also consider other factors reflecting need in determining which schools to fund. For example, in many instances, middle schools or high schools may have a particular need for CSRD support. In awarding CSRD funds under either the section 1502 or FIE authorities, an SEA could give special consideration to middle or high schools that have high dropout rates or to schools that are feeders for such schools.
- Geographical diversity/different grade levels: Among the schools in need of comprehensive school reform, an SEA is encouraged to give priority to schools in LEAs in different parts of the State, including urban and rural communities, and to schools at different grade levels (elementary/middle/high school).

2. **Supporting effective, research-based comprehensive school reform programs:** To receive CSRD funds, a school must intend to implement a high-quality, well-defined, research-based comprehensive school reform program that

integrates, in a coherent manner, nine required components. (See B-1.) The interrelation of the components into a coherent design is critical, rather than a fragmented, piecemeal approach that brings together an array of individual, unrelated models or strategies. Thus, an SEA must develop selection criteria for judging the quality of the comprehensive programs proposed in an LEA's application. The guidance in Question B-3 and Appendix B will assist the SEA in distinguishing comprehensive programs that are based on reliable, research-based practices.

SEAs should seek to fund those proposals that show the most promise for successful implementation and raising student achievement. Although locally developed programs that integrate, in a coherent manner, the nine components in Question B-1 are eligible for CSRD support, externally developed models designed to improve the entire school may be more likely to have rigorous research-based evidence of effectiveness as described in Appendix B and result in improvements in student achievement. Therefore, an SEA should consider giving competitive preference to comprehensive school reform programs that include effective, research-based externally developed models. (See F-4.) Given that model developers may have limited capacity to provide technical assistance, SEAs are encouraged to work with model developers to ensure that priority is given to schools with the greatest need for reform.

Because the legislation expressly permits locally developed programs, however, it would be impermissible for an SEA to establish an absolute priority under which schools seeking to implement locally developed programs would be automatically precluded from receiving CSRD support.

SEAs are also encouraged to give competitive preference to schools initiating the implementation of effective, research-based comprehensive reform programs that cover all aspects of their operations, rather than support schools that would add new components to existing reform programs.

Using expert review, an SEA examines LEA applications in light of the SEA's established criteria.

F-3(a). In the process of designing its subgrant competition, what discretion does an SEA have in selecting competitive criteria?

The intention of the legislation is generally that all Title I eligible schools be eligible to apply for the Title I portion of the CSRD funding, and that all schools, including Title I-eligible schools, be eligible to apply for the FIE portion.

Because of the strong and specific emphasis placed in the legislation on targeting Title I CSRD funds to schools identified as in need of improvement under Title I, states may choose to provide an absolute priority under which only Title I schools in need of improvement would be eligible to compete for Title I CSRD funds.

A state may also establish other priorities as a part of its overall school reform strategy and to further the purposes of the CSRD program. However, such priorities should be designed to give schools or programs a competitive edge in the subgrant selection process, rather than entirely precluding non-priority programs or schools. For example, in awarding CSRD funds, a state may give a competitive priority to schools at a particular grade level (elementary, middle school, high school), but may not entirely exclude schools at other grade levels. Similarly, a state may give a competitive priority to externally developed programs that it has determined are effective, but it may not entirely preclude locally-developed programs that otherwise meet the criteria in the legislation.

F-4. What responsibility does an SEA have with respect to its LEAs' and schools' choice of comprehensive school reform programs?

In its application for CSRD funds, an SEA must describe the process and selection criteria by which the SEA will make competitive grants to eligible LEAs and how the SEA will ensure that only high-quality, well-defined, and well-documented comprehensive school reform programs will be funded. Thus, an SEA is responsible for ensuring that CSRD funds go only to schools that will implement high-quality, research-based comprehensive reform programs. In carrying out this responsibility, an SEA has considerable flexibility. For example, an SEA may give competitive preference to programs that include effective, research-based externally developed models designed to improve the entire school. (See [F-3\(2\)](#). For guidance on judging evidence of effectiveness, see [B-3](#) and [Appendix B](#).) Furthermore, an SEA may establish a competitive preference for programs that incorporate certain models that the SEA determines are particularly effective. An SEA should exercise caution, however, in establishing a competitive preference for a particular set of externally developed models, to ensure that its LEAs and schools still have sufficient flexibility to adopt a program that best meets their needs as determined by the whole school community based on a comprehensive needs assessment. If a school's options are too limited, it may not have the necessary flexibility to best meet its needs.

F-5. To be eligible for CSRD funding, what kind of technical support and assistance must a school receive?

In order to receive CSRD funding, a school must receive ongoing, high-quality external support and assistance from a comprehensive school reform entity with experience or expertise in schoolwide reform and improvement. The success of a program will likely be determined in large part by the quality of the technical assistance that is provided. This assistance may come from a university, comprehensive school reform model developers, the Department's Regional Educational Laboratories and Comprehensive Regional Assistance Centers, or other external entities. Support must be provided not only during the early implementation phases of a reform model, but throughout the implementation of the school's comprehensive reform program. The support may not be limited to a particular curricular area or to a single component of the reform model. Rather, expert assistance must be available to address in a coordinated fashion all aspects of the school's comprehensive reform effort. In awarding grants, therefore, an SEA must ensure that

each funded program will have the external support necessary for the program to succeed. If an LEA has schools that plan to work with external model developers, the LEA is strongly encouraged to submit in its application a letter of commitment from those developers. (See H-3.)

F-5(a). Does technical assistance provided by a local educational agency (LEA) constitute "external support" required for participating schools?

No, while LEAs are responsible for providing participating schools with technical assistance and support in the implementation of their comprehensive school reform programs, the schools must also receive on-going, high-quality assistance and support from a partner that is external to the district.

F-6. May an SEA use CSRD funds to award a planning grant to an LEA whose schools have not yet selected or designed a comprehensive school reform program?

No. An LEA's application for CSRD funds must describe the comprehensive school reform program that each school requesting funds would implement. Thus, a school must have already selected its program. This is not to say, however, that a school's entire comprehensive school reform program must be implemented at once. For example, CSRD funds may be used to train school staff to implement the program the school has selected.

F-7. Should CSRD funds be used to support schools that are already implementing a comprehensive school reform program?

CSRD funds should be used to support schools that are initiating the implementation of comprehensive school reform programs based on reliable research and effective practices. As discussed in Question F-3(1), in determining where to focus its CSRD resources, an SEA must determine which schools are in the greatest need for reform. Thus, it is unlikely that an SEA would provide CSRD support to a school that has been working with a model developer and is already well along in its effort to implement a program designed to improve its entire operation.

F-8. Do SEAs have flexibility regarding the timing of their subgrant competitions?

Yes. CSRD funds that become available to the Department on July 1, 1998 will be available for obligation by an SEA or LEA through September 30, 2000. (This period of availability includes an initial fifteen-month obligation period and a twelve-month carryover period authorized by section 421(b) of the General Education Provisions Act.) Accordingly, an SEA may decide to delay its competition until it believes most schools have had sufficient time to determine their needs and select an appropriate school reform model, with the understanding that LEAs and schools would then have less time to obligate those funds. An SEA could also run separate competitions, awarding a portion of its funds as soon as the State receives them while reserving the remaining funds for LEAs with schools that need additional time to determine what approach best meets their needs.

F-9. In applying to its SEA for a competitive award under this program, what information must an LEA include in its subgrant application?

Each LEA application for a CSRD subgrant must include the following information:

1. **Identification of the schools to be served:** An LEA must identify which schools within the LEA would implement a comprehensive school reform program and the level of funding requested for each school. If the LEA is applying for section 1502 funds, the LEA must include evidence that the schools are eligible to participate under Title I, Part A. Because there may be insufficient funds to serve all schools that an LEA proposes to fund, it may be helpful if the LEA includes in its subgrant application a priority list that ranks the schools on the basis of their needs and the quality of the programs that they would implement.
2. **Description of the program to be implemented:** An LEA must describe the research-based comprehensive school reform program that each school would implement, specifically identifying any externally developed models included in the program. The LEA must demonstrate that each program is of high quality, well-defined, and well-developed and integrates, in a coherent manner, all of the nine components listed in B-1. Because the purpose of the legislation is to support schools that need to improve student achievement, the LEA must also demonstrate the need of its schools to engage in comprehensive reform.
3. **Description of LEA's support:** An LEA must describe how it would provide technical assistance and support for the effective implementation of the comprehensive school reform programs selected by such schools. Specifically, the LEA must identify the Federal, State, local, and private resources that the LEA and its schools intend to commit to implement and sustain a comprehensive school reform program.
4. **Evaluation strategies:** An LEA must describe how it would evaluate the implementation of comprehensive school reforms in its schools and measure the results achieved in improving student academic performance for all students in participating schools.
5. **Additional information:** Each LEA application must also include the following:
 - the amount of funds, if any, requested for administration, technical assistance, and evaluation activities, and an explanation of how those funds would be used.
 - a description of the steps the LEA proposes to take to overcome barriers to equitable program participation, as required under section 427 of the General Education Provisions Act.
 - the general assurances in section 14306 of the ESEA.

- an assurance that CSRD funds will be used only to supplement, and not supplant, Federal, State, and local funds a school would otherwise receive.
- the lower-tier certification covering lobbying and debarment/suspension under 34 CFR Parts 82 and 85.

F-10. May an SEA require an LEA to describe a three-year comprehensive reform program in its application for CSRD funds?

Yes. (See [F-17.](#))

F-11. On what basis does an SEA make continuation awards?

Subject to sufficient appropriations, an SEA will make a continuation award to a subgrantee that has made substantial progress toward meeting the objectives of its local application.

F-12. What is the minimum amount of CSRD funds that an SEA may provide to an LEA?

In awarding competitive grants to LEAs under this program, an SEA must make awards that are of sufficient size and scope to support the start-up costs for the particular comprehensive reform plan selected or developed by a participating school. Toward that end, each LEA grant award must provide at least \$50,000 annually to each participating school.

In addition to the \$50,000 minimum annual per-school allocation, an LEA's grant award may include funds to support the reasonable and necessary costs that an LEA may propose for administrative expenses, technical assistance, and evaluation activities. Funds to support these expenses may not be deducted from a school's minimum allocation. The SEA is responsible for ensuring that the proposed costs do not exceed amounts that are reasonable and necessary.

F-13. May an SEA provide funds for some, but not all, of the schools that an LEA or consortium of LEAs has identified for CSRD support?

Yes. An SEA may fund some, but not all, of the schools for which an LEA has requested CSRD support. The SEA should consider, for example, the needs of the schools for which funding would not be provided compared to those in another LEA that would be funded and whether there are benefits to be gained from funding "clusters" of schools that are all engaged in comprehensive school reform. In addition, the SEA should consider the quality of each school's comprehensive reform proposal and its likelihood of success.

F-14. May several LEAs form a consortium to apply for CSRD funds?

Yes. For LEAs with small student populations, in particular, it may be cost-effective to adopt the same comprehensive school reform model and apply as a consortium.

F-14(a). How does the legislative requirement for a minimum award of \$50,000 per school apply to a consortium of small schools?

Responding to concerns raised by several states regarding the application of the \$50,000 minimum to small schools, language in the committee report accompanying the FY99 Education Appropriations legislation states the following: "The conference agreement recognizes that small schools may have greater opportunities to implement comprehensive school reform efforts through working in collaboration with other small schools. In order to ensure the maximum opportunity for the participation of small schools in the Comprehensive School Reform Demonstration Program, the conference agreement clarifies that the minimum award amount applies to individual schools, or to school consortia serving a maximum of 500 students."

In other words, an individual school receiving CSRD assistance -- regardless of its size -- must receive at least \$50,000 of CSRD funds through its district. However, a consortium of small schools serving a total of no more than 500 students may receive the \$50,000 minimum award amount for the consortium (rather than the \$50,000 minimum for each school in the consortium). If a consortium serves more than 500 students, each school in that consortium must receive at least \$50,000 of CSRD funds annually.

F-15. If a consortium of LEAs is funded, must each participating school within the consortium receive a minimum award of \$50,000 annually?

Subject to the exception for consortia of small schools described in F-14(a), the legislation requires each school participating in the CSRD program to receive a minimum of \$50,000 annually.

F-16. If several schools within an LEA join together to implement a particular model, must each school receive a minimum award of \$50,000?

Subject to the exception for consortia of small schools described in F-14(a), each school participating in the CSRD program must receive a minimum of \$50,000 annually.

F-17. For how many years may a particular school receive CSRD assistance?

Depending on the availability of future Congressional appropriations, a school may receive CSRD support through its LEA for three years. That is, an initial award to an LEA for a particular school would be renewable for two additional years. (See F-10 and F-11.)

F-18. Are public charter schools eligible to participate in the CSRD program?

Under State law, public charter schools are generally either LEAs or public schools within an LEA. As such, public charter schools are eligible to apply for CSRD funds on the same basis as other LEAs or schools. In other words, if a public charter school is an LEA under State law and is eligible for Title I, Part A funds, it may apply to the SEA for

either section 1502 or FIE CSRD funds. Similarly, if a public charter school is a school within an LEA, it may be included in the LEA's application for CSRD funds on the same basis as other similarly situated schools.

F-18(a). What are the implications of the Charter School Expansion Act of 1998 for CSRD awards?

The Charter School Expansion Act reinforces the Department's policy that public charter schools must be permitted to compete for CSRD funds on an equal footing with other public schools and LEAs. They may not be discriminated against in competing for funds simply because of their charter school status. States and districts should use a rational process and criteria to determine which schools--including charter schools and other public schools--are most deserving of CSRD support. The criteria should distinguish among CSRD applicants on the basis of a particular school's need for reform and the quality of the proposed program.

The Charter School Expansion Act did not change the fundamental rules governing CSRD competitions. As the CSRD program guidance indicates, the focus of the CSRD program is to stimulate schoolwide change in schools that need to substantially improve student achievement, particularly Title I schools. (See F-3). For example, the guidance appropriately encourages SEAs to give competitive preference to LEAs that would use section 1502 CSRD funds in Title I schools that have been identified as in need of improvement under section 1116(c) of ESEA. Such preferences may be established to target resources on those schools with the greatest need for reform. Of course, competitive preferences or absolute priorities may not be established for the purpose of excluding charter schools from competing for CSRD funds.

F-18(b). May charter schools that are not LEAs, apply directly to the SEA for CSRD grants?

No. Only LEAs may apply directly to an SEA for CSRD assistance. If an LEA decides not to include a public charter school in its CSRD application, that charter school may not apply directly to the State for funding. A charter school that is not an LEA would have to have an LEA apply for CSRD assistance on its behalf.

When this situation arises, the Department encourages the SEA to work with the LEA to review the charter school's proposal. The SEA and LEA should see if, independent of the school's charter school status, it can be appropriately integrated into the LEAs application based on the school's need for reform and the quality of its proposal.

F-19. May an intermediate unit within a State apply for CSRD funds on behalf of eligible schools for which it provides services?

If an intermediate unit is an LEA under section 14101(18) of the ESEA, it may apply for CSRD funds for use in eligible schools.

F-20. Are private school children eligible to participate in the CSRD program?

The CSRD program is specifically designed to stimulate comprehensive reform of a school's entire operation. Generally, services for private school children under Federal education programs must be provided by employees who are under public supervision and control and must benefit private school children and their teachers directly, not the private school in general. Therefore, there is no provision in the legislation for providing services to private school children. SEAs and LEAs are encouraged, however, to share their knowledge of effective school reform practices with private school officials.

F-21. If an SEA chooses not to apply for CSRD funding, may LEAs in that State still receive CSRD funds?

No. Amounts that would have been allocated to an SEA that chooses not to participate in the program will be reallocated to other States that have a need for additional funds to implement comprehensive school reform programs.

F-22. Are Bureau of Indian Affairs (BIA) schools eligible to compete for CSRD funds?

The Department allocates CSRD funds each year to the Bureau of Indian Affairs. In turn, BIA makes subgrants to successful BIA schools through a competitive process. In addition, a BIA school that is considered by the state in which it is located to be an LEA is eligible to apply to the state for CSRD funds as an LEA. However, while these schools may compete under both the BIA and SEA competitions, they may not receive CSRD funds from both the BIA and the SEA.

F-23. If virtually identical proposals are submitted to an SEA on behalf of different schools, may the SEA consider such proposals for funding?

While local districts and schools may work with an external model developer or a proposal writing firm in developing a school's application for CSRD funds, the developer or firm should work closely with school officials, staff, and community in developing the school's individual application. This process should lead to an application that treats the nine CSRD criteria in an integrated and coherent fashion in light of the school's unique needs. The submission of an "off-the-shelf" design without a direct focus on the needs of the school in question cannot adequately address the comprehensive requirements of CSRD. See also G-6(b) for additional guidance on using CSRD funds to pay proposal writers.

F-24. When should SEAs release continuation funding to grantees?

Since the criterion for continued CSRD funding is that the site has made substantial progress towards meeting the objectives of its local application (See F-11.), the Department strongly recommends that a State wait to award Year-2 funds until after it makes a determination that the school has made substantial progress

in implementing its plan. For example, some States have developed rubrics for use in determining whether particular LEAs and schools have made substantial progress in fulfilling their CSRD plans and meeting implementation benchmarks. These states will make decisions about second and third year awards after applying these rubrics.

G. LOCAL USE OF FUNDS

G-1. For what activities may a school use CSRD funds?

A school may use CSRD funds to support the costs associated with the implementation of the comprehensive reform plan that it has selected or designed. As discussed in Questions A-3 and F-9(3), however, CSRD funds must be coordinated with other resources in order to sustain the school's effort to help all children reach challenging academic standards.

CSRD funds are intended to support substantive plans for comprehensive school reform. The SEA may exercise discretion in ensuring that uses of funds are consistent with the purposes of the CSRD legislation; however, in general grantee LEAs and schools have the flexibility to use CSRD funds, together with other funds, as needed to carry out their approved school reform programs. SEAs and LEAs should work with schools to ensure that CSRD funds support a coherent set of activities that further the nine components of the legislation. (See B-1)

G-2. May an LEA use CSRD funds to cover costs for administrative expenses, technical assistance, and evaluation activities?

Yes. Consistent with applicable State rules, an LEA may use CSRD funds to cover reasonable and necessary expenses for administration, technical assistance, and evaluation activities. (See F-12.)

G-2(a) May pre-award costs be charged to the CSRD grant?

If a school incurs costs after being notified of a CSRD award but before the effective date of the award, these costs may be charged to the CSRD grant to the extent they would have been allowable if incurred after the award date. Written approval from the state educational agency is required. (See G-6(c).)

G-3. To what extent may waivers be sought to facilitate the implementation of a school's comprehensive school reform plan?

Consistent with the waiver provisions in the Elementary and Secondary Education Act, the Goals 2000: Educate America Act, and the School-to-Work Opportunities Act, a school that receives CSRD support may apply for waivers of requirements of other major Federal education programs (e.g., ESEA Title I, Part A; Title II; Title IV; Title VI) if the requirements sought to be waived impede the school's ability to carry out its

comprehensive school reform plan. In applying for waivers, schools in Ed-Flex States should follow the waiver procedures established by their SEA. Schools in other States may seek waivers from the Department, after consulting with their LEA and SEA. Information on the various waiver authorities is available on the Department's home page at www.ed.gov/flexibility or on the Department's Waiver Assistance Line at (202) 401-7801 or 1-800-USA-LEARN.

In addition, the \$50,000 per-school minimum may not be waived because there is no authority to waive requirements affecting the distribution of funds to LEAs. Furthermore, because the Ed-Flex authority does not extend to Title X of the ESEA, an Ed-Flex state may not waive any requirement in the FIE portion of the CSRD legislation.

G-4. Must CSRD funds be used to supplement other Federal, State, and local funds?

Yes. CSRD funds must be used to supplement, and not supplant, Federal, State, and local funds that LEAs and schools would otherwise receive. Unlike most supplement, not supplant provisions, the CSRD supplanting prohibition also applies to Federal funds. In other words, an SEA or LEA may not decrease the resources that would otherwise be available to a school from any other source because that school is receiving CSRD funds. Furthermore, the supplanting prohibition may not be waived.

G-4(a) May an SEA or LEA use CSRD funds to replace resources that are already awarded?

No. As indicated in G-4, the CSRD legislation requires each SEA to provide an assurance that CSRD funds will supplement, not supplant, Federal, State, and local funds the LEAs and schools would otherwise receive. In other words, an SEA or LEA may not decrease the resources that would otherwise be available to a school from any other Federal, State or local source because that school is receiving CSRD funds. This supplanting prohibition must be interpreted in concert with the intent of the CSRD legislation--namely to fund start-up costs for schools, particularly low-performing schools, to implement comprehensive school reform programs.

G-5. When does the period of availability for the FY 1998 CSRD funds end?

The FY 1998 CSRD funds must be obligated by grantees or subgrantees by September 30, 2000. The Department's regulations at 34 CFR 76.707 describe when an obligation occurs with respect to various categories of activities. The awarding of subgrants to LEAs does not constitute an obligation.

G-5(a). How long are CSRD funds available for obligation?

CSRD funds become available on July 1 of a given fiscal year and are initially available for obligation through September 30 of the succeeding fiscal year, a 15-month period. If unobligated funds remain after this initial period of availability, those funds may be carried over and obligated during an additional 12-month period under the Tydings amendment (i.e., October 1--September 30). For example, fiscal year (FY) 1998 CSRD

funds became available on July 1, 1998. They are initially available for obligation through September 30, 1999; then, any unobligated funds may be carried over and obligated through September 30, 2000.

An SEA and LEA must obligate CSRD funds during the period for which the funds are available for obligation. Please note that an obligation does not occur when an SEA makes a grant award to an LEA. CSRD funds are only obligated when they are committed to specific activities.

§76.707 of the Education Department's General Administrative Regulations (EDGAR) When Obligations Are Made	
<i>If the obligation is for --</i>	<i>The obligation is made--</i>
<i>(a) Acquisition of real or personal property</i>	<i>On the date on which the State or subgrantee makes a binding written commitment to acquire the property</i>
<i>(b) Personal services by an employee of the State or subgrantee</i>	<i>When the services are performed</i>
<i>(c) Personal services by a contractor who is not an employee of the State or subgrantee</i>	<i>On the date on which the State or subgrantee makes a binding written commitment to obtain the services</i>
<i>(d) Performance of work other than personal service</i>	<i>On the date on which the State or subgrantee makes a binding written commitment to obtain the work</i>
<i>(e) Public utility services</i>	<i>When the State or subgrantee receives the services</i>
<i>(f) Travel</i>	<i>When the travel is taken</i>
<i>(g) Rental of real or personal property</i>	<i>When the State or subgrantee uses the property</i>
<i>(h) A preagreement cost that was properly approved by the State under the cost principals identified in 34 CFR 74.171 and 80.22</i>	<i>On the first day of the subgrant period</i>

G-5(b). What is the appropriate grant period for CSRD awards?

There is no specified initial grant period required under the CSRD legislation. Initial grant periods should be sufficiently long to ensure that schools can obligate CSRD funds in a timely, yet responsible, way. In many cases, States have set the initial grant period to coincide with the Federal fiscal year and the initial period of availability of the funds. For example, the initial grant period in these States for FY 1998 CSRD funds ends on September 30, 1999. Other States, particularly those whose grant competitions have occurred more recently, have set shorter initial grant periods, sometimes extending into the carryover period—e.g., January 1 through December 31, 1999.

G-5(c). How does the carryover provision apply under CSRD?

Because CSRD is a discretionary program at the State level, an SEA has some discretion regarding carrying over unobligated CSRD funds. Subject to the caveats that follow, an SEA may permit its LEAs to carry over unobligated CSRD funds, or the SEA may collect those funds at the end of the initial grant period and redistribute them to other participating LEAs. This general rule is tempered by the requirement in the CSRD legislation that each participating school must receive at least \$50,000 annually for three years. Thus, provided a school in an LEA is making substantial progress in implementing its CSRD program, the SEA may not redistribute CSRD funds that remain unobligated by the school after its initial grant period if doing so would reduce the total amount of funds available to the school from a given fiscal year's appropriation below \$50,000. On the other hand, if an SEA determines that a school is not making substantial progress and decides not to award the school its second or third year CSRD grant, the SEA may redistribute any unobligated funds, even if doing so would reduce the funds available to the school below \$50,000.

G-6. A school is in the early planning stages of comprehensive reform and has not yet decided which reform model would best meet its needs. May it receive CSRD support to continue this planning?

No. CSRD funds are intended to support the actual implementation of particular reform programs and models, rather than the prior planning that is needed to adopt an appropriate program or model. Such planning would necessarily occur prior to an LEA's application for CSRD funds.

G-6(a). A school has already begun to implement a particular reform model with other Federal, State and local funds. May it receive CSRD support?

The focus of the CSRD legislation is to stimulate schoolwide change in schools that need to substantially improve student achievement, particularly Title I schools. (See F-3.) In awarding grants, a State must determine which schools are in the greatest need for reform. A school that has been working with a model developer and is already well along in its effort to implement a program designed to improve its entire operation is likely to be less in need of assistance than a school that has yet to begin or is in the first

year of implementing comprehensive reform. (See F-7.) A State may limit the possibility of awarding CSRD funds to schools already in the process of implementing a particular model by, for example, giving greater weight in its competitive process to schools that are in the initial stages of implementing comprehensive reform.

However, where a school has previously adopted a model that only partially addresses the nine CSRD components, and the school wishes to expand its activities to undertake a fully comprehensive school reform program, a State may determine that an award would be appropriate in light of the purposes of the legislation. As with all CSRD grants, the CSRD funds provided to these schools must supplement, and not supplant, Federal, State, and local funds that the schools would otherwise receive.

G-6(b). *May a school use CSRD funds to pay or reimburse a proposal writing firm for developing a school's application?*

No, applicants may not use discretionary grant funds such as those provided by CSRD to cover the cost of proposal development. CSRD funds may only be used for "necessary and reasonable" costs in operating the CSRD program. A school cannot pay the writing firm directly from CSRD funds for its proposal development work nor may it reimburse itself for those costs after it receives a CSRD award. The CSRD funding is to be used for program implementation.

G-6(c). *May CSRD funds be used to reimburse the school for costs that were incurred prior to the date it was notified that it would receive CSRD assistance?*

No. CSRD funds must be used to supplement the level of other Federal, State, and local resources that would, in the absence of the CSRD funds, have been spent on comprehensive reform. The fact that a school had incurred costs to implement a particular reform model prior to being notified that it had been selected to receive CSRD funds indicates that the school would have implemented the model, and incurred those costs, absent its CSRD award. Thus, it would violate the supplanting prohibition to use CSRD funds to reimburse the school for costs it incurred prior to being notified that it would receive CSRD funds. (See G-2(a).)

G-7. *When a Title I targeted assistance school is participating in CSRD and thus implementing comprehensive school reform, how may Title I funds be used?*

Title I funds in a targeted assistance school participating in CSRD must still be used in accordance with the Title I statute and regulations--i.e. for supplemental activities for eligible children in greatest need of assistance. This limitation, however, should not interfere with a school's ability to implement comprehensive school reform using, in part, CSRD funds. (Note that these funds are governed by the CSRD legislation, rather than the Title I legislation.) Rather, a targeted assistance school can use its Title I funds to support supplemental activities that are appropriate to meet the needs of its Title I-eligible children and that are integrated in to its comprehensive school reform program. For example, the school's comprehensive reform strategy could include (in addition to

addressing curriculum and instruction, teacher professional development, organization of the school day, parental involvement, etc.) an after-school tutoring program, summer school, extra reading assistance, a mentor program, etc., designed to meet the needs of its Title I-eligible children. The school would use its funds from other sources --e.g., CSRD, state, local, private, and other non-Title I federal funds--to implement its overall reform strategies beyond those appropriate to its targeted Title I population.

G-8. *If a school, in consultation with its LEA, wants to discontinue work with its current model, but go on with its entire-school reform based on other initiatives in the school, can this school continue to receive CSRD funds?*

Even with the greatest care, the match between a model and a school's needs may not work out. The school's primary goal is to improve instruction for all its students. Where its plans and services fail to meet that expectation, it is absolutely proper for the school and district, with state approval, to correct this in the best and most expeditious way possible.

Nonetheless, CSRD anticipates that the combination of services and in-school participation of SEA, LEA and external service providers should help most schools satisfactorily address issues that may arise with their reform plans. CSRD schools and their districts are expected to identify implementation problems early on and seek solutions from the various providers supported by CSRD funds for this purpose.

If, despite timely assistance from the SEA, LEA and outside providers, the school and district conclude that it must drop the model provider portion of its CSRD plan, the SEA should review the school's situation in light of the terms and conditions of the agreement that funded the school in the first place. Continued funding of the school as a CSRD site must be decided on the degree to which the school's alternative plan is consistent with its original proposal for the CSRD competition and the degree to which it meets all the requirements of the CSRD legislation.

H. TECHNICAL ASSISTANCE

H-1. What technical assistance will be provided on research-based, comprehensive school reform models?

The Regional Educational Laboratories, in consultation with other regional service providers funded by the Department, intermediate service agencies, or institutions of higher education, will provide technical assistance to SEAs, LEAs, and schools on a range of issues during the implementation and operation of this program.

The Northwest Regional Educational Laboratory is preparing a listing of research-based school reform models, including those models referenced in the legislation. The information will include a brief description of each model and how it relates to the nine

components in the legislation. The models included in the document will not be an exclusive list and will be updated as additional reform approaches are examined.

H-2. How can an LEA or school obtain information regarding the effectiveness of a particular model?

The listing that the Northwest Regional Educational Laboratory is preparing, which will be widely disseminated, will contain information on various reform models, including contact information on the model developers. An LEA or school may contact the developer of the model it wishes to implement to obtain specific information regarding the model's effectiveness. In addition, SEAs may seek technical assistance from other entities with expertise in comprehensive reform, such as universities, private organizations, and the Regional Educational Laboratories and Comprehensive Regional Assistance Centers supported by the Department.

H-3. Will a model developer be able to provide technical assistance to all LEAs that wish to implement that model?

A model developer may not have the capacity to provide technical assistance to all LEAs throughout the Nation that wish to implement that model. As a result, it may be prudent for an SEA to obtain evidence of a model developer's commitment that it would be able and willing to provide technical assistance to an LEA wishing to implement its model before the LEA is funded. It would also be prudent for model developers to be aware of any competitive priorities established by the SEA in deciding which schools to assist. To address the capacity issue, a developer might only assist schools that submit, as part of the LEA application for CSRD assistance, a letter from the developer indicating its intent to work with them. (See F-5.)

H-4. *Can regional education laboratories or comprehensive assistance centers be paid to serve as external providers of assistance to grantees under CSRD?*

Yes, these regional technical assistance providers can be paid to serve as external providers of assistance, so long as the assistance is above and beyond what they would provide under their existing contracts or service agreements supported by Federal funds.

H-5. *Can regional labs or comprehensive centers serve as peer reviewers of LEA applications?*

In a state where federally funded technical assistance providers intend to or would charge at least some LEAs for external assistance, they should not serve as peer reviewers. In this situation, there is a potential for a conflict of interest for the lab or the center since it would appear to be in a position to influence which LEAs might receive a CSRD award.

I. EVALUATION

I-1. What should an SEA and LEA consider in evaluating the CSRSD program?

SEAs and LEAs must evaluate the implementation of comprehensive school reform programs and measure the results achieved in improving student academic performance in schools receiving CSRSD funds. This evaluation requirement is intended primarily to inform SEAs and LEAs as to how effective the schools have been in improving student achievement. SEAs and LEAs should use the results of their evaluations to improve programs in schools with poor performance and share the successes of schools with high performance.

SEAs and LEAs should consider the following in developing their evaluations:

- **Student performance data:** Performance measures should be clearly related to the intended outcomes of the comprehensive school reform programs implemented in the State and should produce quantitative and qualitative data that include, but are not restricted to, student achievement. Performance measures in a school implementing a comprehensive school reform program should be compared with past performance at the same site, performance at similar sites within the district, or against national, State, or local student performance standards. The evaluation should rely on the same assessments that are being used to assess all students against challenging State standards and are serving as the assessments for accountability in Title I. These can be supplemented by local or school-developed assessments of student performance. To the extent feasible, assessment results should be disaggregated by the categories specified in Title I to examine the impact of reform on targeted groups. SEAs and LEAs may wish to monitor the extent to which comprehensive school reform programs have affected other indicators of school performance such as attendance, grade promotion, graduation, suspension and expulsion rates, course-taking patterns, and parental involvement.
- **Program implementation data:** Research has consistently shown that implementation is a powerful factor in the success of school reform programs. Comprehensive reforms can succeed if they are implemented well, with particular attention focused on start-up activities and long-term maintenance. Areas that should be tracked for implementation include stakeholder support, parental participation, continuous staff development, and monitoring for performance. SEAs and LEAs should consider gathering information on the nature and extent to which schools receive external technical assistance in implementing the program, the sources of the technical assistance, and the perception of its usefulness in furthering the implementation and impact of the program.

I-2. What are the Department's plans for the national evaluation of CSRSD?

The national evaluation of the CSRSD Program will be designed to address key questions concerning participating schools, the programs being implemented, and impact on student

performance. The Department intends to use the basic information that States provide on subgrantees (see Early Implementation Data Form that is included in the application package) to compile data on the amounts of the awards, the characteristics of participating schools (e.g., elementary, middle, or secondary; poverty level; Title I schoolwide or targeted assistance; schools identified for improvement under Title I; schools identified for intervention under other State or local policies, etc.) and the models being implemented.

The national evaluation of participating schools would be linked with a longitudinal survey of schools, tracking standards-based reform efforts in a nationally representative sample of Title I schools. The draft questionnaire for this study currently asks school principals about the models they are using, the demographics of their school, and features of the school's curriculum, instruction, professional development, and parent and community involvement. Additional items would be added to address model selection, program implementation, and involvement in technical assistance. As in the longitudinal survey, all CSRD schools or their LEAs would submit their State/local assessment results and their school report cards to document student performance. The longitudinal survey is expected to run three years with annual data collections to track progress. The representative sample of Title I schools included in the national longitudinal study provides an appropriate comparison group for the Title I schools participating in CSRD.

State and local implementation surveys would also provide feedback on Federal guidance and federally supported technical assistance. These may be supplemented by case studies of the site selection process that will describe the expert reviews and early decision-making.

J. MISCELLANEOUS

J-1. What portions of the Education Department's General Administrative Regulations (EDGAR) apply to the CSRD program?

The EDGAR provisions applicable to the CSRD program are Part 76 (State-Administered Programs), Part 77 (Definitions), Part 80 (Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments), Part 82 (New Restrictions on Lobbying) and Part 85 (Governmentwide Debarment and Suspension (Nonprocurement) and Governmentwide Requirements for Drug-Free Workplace (Grants)).

J-2. What is the role of the Title I Committee of Practitioners in the CSRD program?

Since the bulk of dollars available under CSRD come from the Title I Demonstration Authority, the Department encourages SEAs to seek advice from their Committees as they implement the CSRD program. The Committee of Practitioners is well suited to provide input from parents, teachers, and local communities to ensure that policies and selection

criteria affecting CSRD funds in Title I schools complement existing policies that promote the goal of enabling all children to meet State standards.

APPENDIX A CSRD LEGISLATION

The Comprehensive School Reform Demonstration (CSRD) program was established in the Fiscal Year 1998 Appropriations Act for the U.S. Department of Education, Public Law 105-78. The legislation directed that the program was to be implemented using guidance provided in the Conference Report accompanying the Appropriations Act, House Report No. 105-309. Section I below provides excerpts from the Appropriations Act that established CSRD. Section II below provides excerpts from the Conference Report that guides the implementation of the program.

Section I. From the Appropriations Act:

EDUCATION FOR THE DISADVANTAGED

For carrying out title I of the Elementary and Secondary Education Act of 1965 ...

... \$120,000,000 shall be available under section 1002(g)(2) to demonstrate effective approaches to comprehensive school reform to be allocated and expended in accordance with the instructions relating to this proviso in the statement of the managers on the conference report accompanying this Act: Provided further, That in carrying out this initiative, the Secretary and the States shall support only approaches that show the most promise of enabling children served by title I to meet challenging State content standards and challenging State student performance standards based on reliable research and effective practices, and include an emphasis on basic academics and parental involvement.

* * *

EDUCATION RESEARCH, STATISTICS, AND IMPROVEMENT

For carrying out activities authorized by the Educational Research, Development, Dissemination, and Improvement Act of 1994 ...

... \$25,000,000 shall be available to demonstrate effective approaches to comprehensive school reform to be allocated and expended in accordance with the instructions relating to this proviso in the statement of managers on the conference report accompanying this Act: Provided further, That the funds made available for comprehensive school reform shall become available on July 1, 1998, and remain available through September 30, 1999, and in carrying out this initiative, the Secretary and the States shall support only approaches that show the most promise of enabling children to meet challenging State content standards and challenging State student performance standards based on reliable research and effective practices, and include an emphasis on basic academics and parental involvement.

**Section II. Excerpts from the Joint Explanatory Statement of the Committee of Conference
(H.R. No. 390, 105th Congress 1st Session, 32,38,96-99,106-109)**

EDUCATION FOR THE DISADVANTAGED

... The conference agreement provides \$150,000,000 for comprehensive school reform, including \$120,000,000 under the title I program, \$26,000,000 under the fund for the improvement of education, and \$4,000,000 under the regional educational laboratories...

The conferees agree that the purpose of this initiative is to provide financial incentives for schools to develop comprehensive school reforms, based on reliable research and effective practices and including an emphasis on basic academics and parental involvement, so that all children can meet challenging state content and performance goals. The conference agreement establishes a floor of 83% of the total funds provided for local educational agencies (LEAs) eligible for title I basic grants; all LEAs may compete for the remaining funds provided under the fund for the improvement of education. The conferees believe that focusing the bulk of the incentive funding on schools eligible for title I funds will leverage systemic improvements in student achievement throughout the \$8 billion title I program.

The conferees are impressed by gains in student performance in a number of schools across the country that are using new comprehensive models for school-wide change covering virtually all aspects of school operations, rather than a piecemeal, fragmented approach to reform. Examples of such comprehensive school reform models include: Accelerated Schools, ATLAS Communities, Audrey Cohen College, Coalition of Essential Schools, Community for Learning, Co-NECT, Direct Instruction, Expeditionary Learning Outward Bound, High Schools That Work, Modern Red Schoolhouse, National Alliance for Restructuring Education, Paideia, Roots and Wings, School Development Program, Success for All, Talent Development High School and Urban Learning Center.

While no single school improvement plan can be best for every school, the conferees believe that more schools should be encouraged to examine successful, externally developed comprehensive school reform approaches that can be adapted in their own communities. The conference agreement includes funding under the fund for the improvement of education to enable the Department, in consultation with outside experts, to identify and disseminate information to schools about such approaches. Such approaches must be based on rigorous research and effective practices. However, schools are not restricted to using only those approaches identified by the Department are free to develop their own school-wide reform programs that are based on rigorous research and meet the criteria listed below. Further, the conferees direct that funds made available to schools under this initiative shall be used only for comprehensive school reform programs that:

- a. employ innovative strategies and proven methods for student learning, teaching, and school management that are based on reliable research and effective practices, and have been replicated successfully in schools with diverse characteristics,

- b. have a comprehensive design for effective school functioning, including instruction, assessment, classroom management, professional development, parental involvement, and school management, that aligns the school's curriculum, technology, professional development into a school-wide reform plan designed to enable all students to meet challenging state content and performance standards and addresses needs identified through a school needs assessment,
- c. provide high-quality and continuous teacher and staff professional development and training,
- d. have measurable goals for student performance and benchmarks for meeting those goals,
- e. are supported by school faculty, administrators and staff,
- f. provide for the meaningful involvement of parents and the local community in planning and implementing school improvement activities,
- g. utilize high-quality external technical support and assistance from a comprehensive school reform entity (which may be a university) with experience or expertise in school-wide reform and improvement,
- h. include a plan for the evaluation of the implementation of school reforms and the student results achieved, and
- i. identify how other resources (federal/state/local/private) available to the school will be utilized to coordinate services to support and sustain the school reform effort.

The conferees direct that the Secretary of Education allocate title I comprehensive school reform funds based on each state's relative share of prior-year title I grants under section 1124 to state educational agencies (SEAs), upon application to the Secretary. In cases where a SEA declines to apply for its formula-based allocation, the Secretary shall reallocate the funds to other states that have a need for additional funds to implement comprehensive school reform programs. The Secretary may reserve up to one percent of the funds for grants to schools supported by the Bureau of Indian Affairs and in the territories, and up to one percent of the funds to conduct national evaluation activities to assess results achieved by the implementation of comprehensive school reform in title I schools. The conferees anticipate that initial evaluation activities will include development of a plan for a third-year national evaluation, collection of baseline data, and assessment of the first-year implementation activities. The plan for a national evaluation should focus on the results achieved by schools undertaking comprehensive school reform and assess the effectiveness of various school reform initiatives in schools with diverse characteristics (urban/rural, title I/non-title I, elementary/middle school/high school, etc.). Prior to the completion of the third-year national evaluation, the Secretary shall submit an interim report to the House and Senate appropriations and authorizing committees.

The conferees direct that each SEA receiving funds under this initiative use such funds to award grants, on a competitive basis, to enable LEAs within the state to implement comprehensive

school reform programs. Each SEA application to the Secretary shall describe (1) the process and selection criteria by which the SEA, using expert review, will make competitive grants to eligible LEAs, (2) how the SEA will ensure that only high quality, well-defined, and well-documented comprehensive school reform programs meeting the criteria listed above are funded,(3) how the SEA will disseminate materials developed by the Department identifying research-based comprehensive school reform models and provide technical assistance to assist LEAs and schools in evaluating, selecting, developing and implementing comprehensive school reforms,(4) how the SEA will evaluate the implementation of comprehensive school reforms and measure the results achieved in improving student academic performance, and (5) such other criteria as the Secretary may reasonably require. The conferees direct that each SEA provide assurances that the financial assistance provided shall supplement, not supplant, federal, state and local funds the LEAs and schools would otherwise receive. The conferees further direct that SEAs provide such information as the Secretary may require, including the names of the LEAs and the individual schools receiving allocations and the amount allocated to each school.

In awarding competitive grants to LEAs using title I funds, the conferees direct SEAs to make awards that are of sufficient size and scope to support the initial start-up costs for particular comprehensive reform plan selected or designed by the schools identified in the LEA application, but that are not less than \$50,000 per school and renewable for two additional years after the initial award. In allocating comprehensive school reform funds under this account, the conferees encourage SEAs to award grants to LEAs that will use these funds in schools in need of improvement under section 1116(c) of part 1 of Title I of ESEA. The conferees also encourage SEAs to award grants to LEAs in different parts of the state, including urban and rural communities, to LEAs proposing to serve schools at different grade levels (elementary/middle/high school), and to LEAs that demonstrate a commitment to assisting schools with budget reallocation strategies necessary to ensure that comprehensive school reforms are properly implemented and sustained in the future. SEAs may reserve up to five percent of these funds for administrative, evaluation and technical assistance expenses, including expenses necessary to inform LEAs and schools about research-based comprehensive school reform approaches.

The conferees direct that each LEA application to the SEA for comprehensive school reform funds (1) identify which schools eligible for title I funds within the LEA will implement a comprehensive school reform program and the level of funding requested, (2) describe the research-based comprehensive school reform programs that such schools will implement, (3) describe how the LEA will provide technical assistance and support for the effective implementation of the comprehensive school reform programs selected by such schools, and (4) describe how the LEA will evaluate the implementation of comprehensive school reforms in such schools and measure the results achieved in improving student academic performance.

* * *

EDUCATION RESEARCH, STATISTICS AND IMPROVEMENT

...For regional education laboratories...The conferees agree that \$4,000,000 of this amount shall be used in accordance with the direction in House Report 105-205 regarding comprehensive school reform.

...For the fund for the improvement of education (FIE)... The conference agreement includes \$26,000,000 for comprehensive school reform... The agreement also provides for extended availability of \$25,000,000.

The conferees direct that the \$25,000,000 be awarded by the Secretary of Education to SEAs for grants to LEAs, to be used in conjunction with \$120,000,000 provided under title I. These funds shall be allocated based on each state's relative share of the school-age (ages 5-17) population to SEAs, upon application to the Secretary, except that the Secretary may utilize other reasonable criteria to determine state allocations. In cases where a SEA declines to apply for its formula-based allocation, the Secretary shall reallocate the funds to other states that have a need for additional funds to implement comprehensive school reform programs. The Secretary may reserve up to one percent of the funds for grants to Indian schools and the territories, and up to one percent of the funds, that combined with the title I evaluation set-aside, shall be used for national evaluation activities.

The conferees intend that schools receiving financial assistance under this account select or develop comprehensive school reform approaches that meet the criteria outlined under title I--demonstration of innovative practices, and that requirements for state and LEA applications outlined under title I--demonstration of innovative practices also apply, except that any school within an LEA may be included in the LEA's application for financial assistance provided under this account. The conferees further agree that the Secretary shall administer the comprehensive school reform initiative as a unified program, and that each SEA and LEA may develop a consolidated application for funds provided under both this and the title I account.

In awarding competitive grants to LEAs using FIE funds, the conferees direct SEAs to make awards that are of sufficient size and scope to support the initial start-up costs for the particular comprehensive reform plan selected or designed by the schools identified in the LEA application, but that are not less than \$50,000 per school and renewable for two additional years after the initial award. The conferees encourage SEAs to award grants to LEAs in different parts of the state, including urban and rural communities, and to LEAs proposing to serve schools at different grade levels (elementary/middle/high school), and to LEAs that demonstrate a commitment to assisting schools with budget reallocation strategies necessary to ensure that comprehensive school reforms are properly implemented and sustained in the future. SEAs may reserve up to five percent of these funds for administrative, evaluation and technical assistance expenses, including expenses necessary to inform LEAs and schools about research-based comprehensive school reform approaches.

The conference agreement also includes \$1,000,000 that the Department shall use to identify research-based approaches to comprehensive school reforms that show the most promise of

meeting the objectives of this initiative, and disseminate that information to SEAs, LEAs, and schools so that they can make informed choices about what strategies will work best in their communities. In identifying such approaches, the Department shall consult with outside experts in disciplines relevant to school-wide transformation, which may include effective teaching and learning methods, child development, assessment, school finance, school organization and management, and evaluation, on whether such approaches are based on reliable research and effective practices. The Department shall report to the appropriations and authorizing committees on the process and criteria used to determine whether such approaches are based on rigorous, reliable research and effective practices...

APPENDIX B

CONTINUUM OF EVIDENCE

OF EFFECTIVENESS

CONTINUUM OF EVIDENCE OF EFFECTIVENESS

	Most Rigorous	Somewhat Rigorous	Marginal
Theory/Research Foundation	Does the model explain the theory behind its design, including references to the scientific literature, that elucidate why the model improves student achievement?	Does the model state the theory behind its design explaining how the model's components reinforce one another to improve student achievement?	Does the model explain the theory behind its design?
Evaluation-based Evidence of Effectiveness	Have student achievement gains been shown using experimental and control groups created through large-scale random assignment or carefully matched comparison groups?	Have student achievement gains been shown using between or within-school comparisons?	Have student achievement gains been shown for a single school?
	Has the model produced educationally significant pre and post intervention student achievement gains as reliably measured using appropriate assessments?	Has the model produced student achievement gains relative to district means or other comparison groups using appropriate assessment instruments?	Has the model produced improvements on other indicators of student performance , e.g. student attendance, graduation rates, or student engagement?
	Have the student achievement gains been sustained for three or more years?	Have the student achievement gains been sustained for one or two years?	Have other indicators of improved student performance been sustained for one or two years?
	Have the student achievement gains been confirmed through independent, third-party evaluation?	Has the model been evaluated by a state, district, or school evaluation team?	Has the model been evaluated by its developers?

Implementation	Has the model been fully implemented in multiple sites for more than 3 years?	Has the model been fully implemented in the original site(s) for more than three years?	Has the model been fully implemented in the original pilot site(s) for a minimum of one school year?
	Is documentation available that clearly specifies the model's implementation requirements and procedures, including staff development, curriculum, instructional methods, materials, assessments, and costs?	Is documentation available that attempts to describe the implementation requirements of the model including staff development, curriculum, instruction methods, materials, and assessments?	Is documentation available that provides a general description of the program's requirements?
	Are the costs of full implementation clearly specified, including whether or not the costs of materials, staff development, additional personnel etc. are included in the program's purchase price?	Have the costs of full implementation been estimated, including whether or not the costs of materials, staff development, additional personnel, etc. are included in the program's purchase price?	Is documentation available that provides general information about the program's costs?
	Has the model been implemented in schools with characteristics similar to the target school: same grade levels, similar size, similar poverty levels, similar student demographics such as racial, ethnic, and language minority composition?	Has the model been successfully implemented in at least one school with characteristics similar to the target school?	Is information on grade level, size, student demographics, poverty level, and racial, ethnic and language minority concentration available for the schools where the model has been implemented?
Replicability	Has the model been replicated successfully in a wide range of schools and districts, e.g. urban, rural, suburban?	Has the model been replicated in a number of schools or districts representing diverse settings?	Is full replication of the model being initiated in several schools?
	Have the replication sites have been evaluated, demonstrating significant student achievement gains comparable to those achieved in the pilot site(s)?	Have some replication sites been evaluated, demonstrating positive gains in student achievement?	Are promising initial results available from the replication sites?

The following examples show how the evidence of effectiveness table might be used to show how the table might be used:

Example 1

A school is considering a model whose stated purpose is to facilitate the school's development of a common set of goals for the school. The model provides five teachers and the principal with coaching in the principles of whole school transformation. Each school using the model is put in touch with other schools using the model. To-date the summary of the research-base for the model suggests that a single school which has used the model for the past two years has shown improvement in math scores over the last year. There is, however, no systematic evaluation of the model currently underway or planned. The costs for the model are approximately \$3,000 per participant, approximately \$20,000 per school.

Using the table as a guide, based on the description provided, a State, LEA, or school would probably conclude that the evidence of effectiveness for the model is unacceptably weak and, therefore, not accept this model. No research basis or other justification is provided for the theory behind the model, only a very vague statement that school staff should work together to be effective. The evidence for the effectiveness of the implementation of the model is extremely sketchy. The description includes a statement that the model has been implemented in a number of schools but there is no analysis of what it would take to implement the model. Given that only a few teachers and the principal would be involved and the estimated costs, the model probably provides only a low level of involvement. The model provides no evidence that this level of implementation is sufficient to produce results. The only student achievement results presented are for a single school for a short period of time in one subject. There is no information on how achievement was measured nor is any evaluation planned. Given this level of evidence, the model would likely fall below the marginal standards of rigor that States, LEAs, and schools would want to consider for a research-based comprehensive model of school reform. Apart from the marginal evidence of effectiveness, the model also does not address all nine components listed in Question B-1.

Example 2

A school is considering a model that emphasizes a curriculum in reading and mathematics using specific instructional techniques to guide classroom teaching and learning activities. The model provides teachers with intensive, on-going staff development using professional facilitators trained by the model developer. In addition to providing staff development, the facilitators remain on site as the model is implemented to ensure that all components of the model are working together. The program has been fully implemented in approximately 300 schools in 37 districts in 9 states around the country. Student achievement is measured not only by commercial standardized tests but also by state assessment systems where appropriate. Local adaptations of the model are available for schools serving a predominately Spanish-

speaking community. When compared to schools matched on socio-economic characteristics, schools using this model show reading and math scores approximately three-quarters of a standard deviation higher. These results are similar for both African-American and white students. The program has been evaluated by its developer in approximately 12 sites over two years.

The evidence for this model is much stronger than for Example 1. While this model provides some details along each of the four dimensions in the chart, the implementation evidence is quite general. Furthermore, the school proposing to implement this model would need to address, in a coherent manner, all nine components listed in Question B-1.

There are some additional questions that States and school might ask about this model: Could the developer describe what was provided in the way of instructional materials? How will teachers learn the principles of instruction? For which grades and which types of schools are the achievement gains demonstrated? Because the model has only been evaluated by the developer, States or school could ask if there are any plans for an independent, third-party evaluation. While it is likely that the developer could provide satisfactory answers to most of the questions, the process would help reveal the relative strengths and weaknesses of this particular model.

Example 3:

An elementary school in need of improvement has been studying how it could improve the very low scores on State assessments scores of its students in reading, math and other core content areas. The school leadership, in consultation with staff, parents, local university representatives, and community groups, has carefully reviewed school performance data and assessed what needs to be improved across the entire school program, concluding that the school needs a comprehensive approach to reform all aspects of its operations and instructional program.

As part of this process, participants reviewed both individual academic curricular programs as well as comprehensive reform models that include both teaching and learning materials and guidance for school organization and management. The school and its partners looked specifically at evidence of effectiveness for both the individual programs and the comprehensive models. In addition, they studied the match between the programs and the State's rigorous content standards of excellence for academic subject matter, and sought out information on how well the programs had been implemented in similar districts. After considerable discussion among school administrators, teachers, parents, community members and outside experts, the school decided to develop its own comprehensive school reform model, which would include upgrading curriculum and instruction, teacher professional development, school organization, parental involvement activities, and testing.

The school's proposed model is based on the careful integration of distinct,

research-based curricular programs with strong track records of effectiveness. The goal of the integration is a coherent instructional package that would address State content and performance standards; be aligned with district and State assessment systems; include professional development that helps teachers master the curricular programs as well as integrate the parts into a unified instructional approach; and include an evaluation strategy so the school can learn what is working and change what is not. As a result of this process, the school has decided to work under a Title I schoolwide approach so that it can bring together a variety of Federal, State, and other resources to adopt the curricular programs necessary to reform its instructional program and then move into a long term implementation effort.

Using the table as a guide, the example makes clear that the school has looked at the evidence of effectiveness that supports its choice of discrete curricular programs (in that regard addressing issues in row two). However, row one of the table suggests that, in its application, the school should explain the theoretical or research foundation for the model it proposes. At this point the school has not made clear why it expects its comprehensive model, which combines multiple discrete curricular elements, to function effectively as a whole. Concerning implementation, it is unclear how the school has assessed what will be required to make the program work at the classroom level. Thus, answers to the questions in row three of the table would be useful in the school's CSRD application. Finally, the example indicates that the school sought information on the uses in other settings of the selected programs. This shows a sensitivity to the questions raised in row four of the table. In a CSRD application, the school should discuss these issues more fully. The school should also discuss more thoroughly how its model incorporates each of the nine components listed in Question B-1.